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**UNITED STATES DISTRICT COURT FOR THE
DISTRICT OF NEW JERSEY**

IN RE DUCTILE IRON PIPE
FITTINGS (“DIPF”) DIRECT
PURCHASER ANTITRUST
LITIGATION

Civ. No. 12-711 (AET)(LHG)

**DIRECT PURCHASER PLAINTIFFS’ NOTICE OF MOTION FOR
ATTORNEYS’ FEES, EXPENSES, AND INCENTIVE AWARDS**

PLEASE TAKE NOTICE THAT, in accordance with this Court’s January 10, 2018 Order [ECF No. 473], on May 10, 2018 at 10:00 a.m., the undersigned attorneys for Direct Purchaser Plaintiffs (“DPPs”) in the above-captioned action shall move before the Hon. Anne E. Thompson, U.S.D.J., Clarkson S. Fisher Building, & U.S. Courthouse, 402 East State Street, Trenton, New Jersey 08608, for the entry of an order for:

- (i) an award of attorneys’ fees of \$2,929,166.67 (one-third the total amount of the McWane Settlement);
- (ii) reimbursement of incurred expenses of \$1,181,667.59; and

(iii) incentive awards of \$15,000 each to eight current and former named plaintiffs, including City and County of Denver; Coastal Plumbing Supply Company Inc.; GCO, Inc. f/k/a Groeniger & Co.; Hi Line Supply Co. Ltd.; John Hoadley & Sons, Inc.; Mountain States Supply LLC; Mountainland Supply LLC; and Public Works Supply Co., Inc.

In support of this motion, DPPs rely upon the Memorandum of Law in Support of DPPs' Motion for Attorneys' Fees, Expenses, and Incentive Awards; the Declaration of Elana Katcher in Support of DPPs' Motion for Final Approval of Settlement and for Attorneys' Fees, Expenses, and Incentive Awards; and the Declaration of Lori Castaneda Regarding Notice and Settlement Administration.

A proposed form of order is submitted herewith.

DATED: April 10, 2018

/s/ Joseph J. DePalma
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CERTIFICATE OF SERVICE

I, Karen A. Confoy, hereby certify that on this day, a true and correct copy of Direct Purchaser Plaintiffs' Notice of Motion for Attorneys' Fees, Expenses, and Incentive Awards; Memorandum of Law in Support of Direct Purchaser Plaintiffs' Motion for Attorneys' Fees, Expenses, and Incentive Awards; the Declaration of Elana Katcher in Support of Direct Purchaser Plaintiffs' Motion for Final Approval of Settlement and for Attorneys' Fees, Expenses, and Incentive Awards; the Declaration of Lori Castaneda Regarding Notice and Settlement Administration; and Proposed Form of Order were electronically filed and served on all counsel of record via the Court's ECF system.

Dated: April 10, 2018

/s/ Karen A. Confoy
Karen A. Confoy